IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO.

v. : DATE FILED: August 2, 2007

TYKEEM WILLIAMS : VIOLATIONS:

18 U.S.C. § 472 (possessing counterfeit

: currency - 5 counts)

18 U.S.C. § 473 (dealing in counterfeit

: currency - 4 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 1, 2007, in the Neiman Marcus store at the King of Prussia mall, King of Prussia King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS,

with intent to defraud, possessed and concealed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$740 in counterfeit \$20 Federal Reserve Notes.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2007, in the Neiman Marcus store at the King of Prussia mall, King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is, approximately \$740 in counterfeit Federal Reserve Notes with the intent that the counterfeit Federal Reserve Notes be passed, published, and used as true and genuine.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2007, in the Bloomingdale's store at the King of Prussia mall, King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS,

with intent to defraud, possessed and concealed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$260 in counterfeit \$20 Federal Reserve Notes.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2007, in the Bloomingdale's store at the King of Prussia mall, King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is, approximately \$260 in counterfeit Federal Reserve Notes with the intent that the counterfeit Federal Reserve Notes be passed, published, and used as true and genuine.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 7, 2007, in the Bloomingdale's store at the King of Prussia mall, King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS,

with intent to defraud, possessed and concealed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$580 in counterfeit \$20 Federal Reserve Notes.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 7, 2007, in the Bloomingdale's store at the King of Prussia mall, King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is, approximately \$580 in counterfeit Federal Reserve Notes with the intent that the counterfeit Federal Reserve Notes be passed, published, and used as true and genuine.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2007, in the Neiman Marcus store at the King of Prussia mall, King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS,

with intent to defraud, possessed and concealed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$460 in counterfeit \$20 Federal Reserve Notes.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2007, in the Neiman Marcus store at the King of Prussia mall, King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is, approximately \$460 in counterfeit Federal Reserve Notes with the intent that the counterfeit Federal Reserve Notes be passed, published, and used as true and genuine.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2007, in the Neiman Marcus store at the King of Prussia mall, King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYKEEM WILLIAMS,

with intent to defraud, possessed and concealed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$480 in counterfeit \$20 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

A TRUE BILL:
GRAND JURY FOREPERSON

PATRICK L. MEEHAN UNITED STATES ATTORNEY